

**UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF TEXAS**

JEREMY WADE STORY)	
Plaintiff,)	
v.)	CIVIL ACTION NO. 1:23-cv-01120
)	
WILLIAMSON COUNTY)	
JUDGE BILL GRAVELL, ET AL)	
Defendant.)	

NOTICE OF APPEARANCE

TO THE HONORABLE U.S. DISTRICT COURT JUDGE

Counsel for Defendants Williamson County Judge Bill Gravell, Williamson County Sheriff Mike Gleason, Williamson County Deputy Brian Casey, and Williamson County Deputy Jason Briggs (hereinafter “Named Defendants”) enters this Notice of Appearance of Counsel as follows:

C. Robert Heath
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Co-counsel for All Named Defendants

Counsel for Named Defendants agreed to a waiver of service and the answer date for the Named Defendants is December 11, 2023.

There are also two Unnamed Defendants in this lawsuit sued in their individual capacities and identified only as Officers DOE 1 and DOE 2. Although the Amended Complaint may invite the inference that they are deputy sheriffs, that is not clear, and they are identified merely as “law enforcement officers working in Williamson County. Counsel for the Named Defendants does not know the identity of the Unnamed Defendants Officers DOE 1 and DOE 2 and does not know who will be the Attorney who will represent the Officers DOE 1 and DOE 2 if and when they are identified and if and when they are served.”¹

Respectfully submitted,

/s/ C. Robert Heath

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Counsel for Named Defendants

¹ Paragraph 6 of Plaintiff’s First Amended Complaint says “Plaintiff will identify the Doe Defendants during discovery and then serve them via the WC Sheriff’s Department Office, , , or wherever they may be found.” On Tuesday, October 24, 2023, Plaintiff filed a Summons Return asserting service on Officers DOE 1 and DOE 2. However, the Doe Defendants have not yet been identified and it is not clear that they have received a copy of the suit or even know that they are being sued as a certified mail receipt apparently signed by an administrative employee of the Sheriff’s Department rather than the addressees does not appear to comply with the requirements for service. Fed. R. Civ. Proc. 4(e)(1); Tex. R. Civ. Proc. 107(c).

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been filed via CM/ECF electronic filing and Certified Mail, Return Receipt Requested on this the 3rd day of November, 2023, to:

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/s/ C. Robert Heath

C. Robert Heath